

District Court
Civil Action No.

Richard J. Andrew
Petitioner,

v.

Kenneth W. Nelson
Respondent,

MOTION FOR APPOINTMENT OF COUNSEL

Now comes the Petitioner Richard J. Andrew, in the above-captioned matter, who respectfully moves this Honorable Court pursuant to 28 U.S.C. 2254(5), to appoint him counsel.

As reasons therefore, Petitioner States:

1. He has already spoken with attorney James L. Sultan who represented him in state court and is familiar with the case and is willing to accept an appointment in Federal court if the Court wishes to do so. Mr. Sultan is on the list for Federal Counsel Appointments also.

2. There are complex legal issues that petitioner clearly doesn't understand, and the assistance of counsel is needed for research and litigation, as the main focus to perfect this Federal Habeas Corpus lies on the Federal constitutional law under the 6th Amendment and the 14th Amendment to the United States Constitution.

Wherefore,

The petitioner hopes and prays that this Honorable Court grant this motion, appointing him James L. Sultan, and (or) for any type relief it deems just.

RESPECTFULLY SUBMITTED,



Richard J. Andrew pro se
Cadre Program
20 Administration Rd.
Bridgewater, Ma. 02324

CERTIFICATE OF SERVICE

I here by certify that I served the forgoing upon the United States District Court (Massachusetts) by mailing a copy thereof, U.S. Mail, postage prepaid, to: Clerk of Court William L. Ruane, United States District Court, one Courthouse Way, Suite 2300, Boston, Ma. 02210.



Richard J. Andrew

August 18, 2004